KRONENBERGER BURGOYNE, LLP

Karl S. Kronenberger (CA Bar No. 226112) Jeffrey M. Rosenfeld (CA Bar No. 222187)

150 Post Street, Suite 520 San Francisco, CA 94108

Telephone: (415) 955-1155 Facsimile: (415) 955-1158 karl@KBInternetLaw.com

jeff@KBInternetLaw.com

Attorneys for Plaintiffs UNITED STATES OF AMERICA CHESS FEDERATION, INC. and RANDALL D. HOUGH

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA CHESS FEDERATION, INC., et al,

Plaintiffs,

٧.

SUSAN POLGAR, et al.,

Defendants.

Case No. 3:08-CV-05126-MHP

SUPPLEMENTAL DECLARATION
OF BILL HALL IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT SUSAN POLGAR'S
MOTION FOR SUMMARY
JUDGMENT

DATE: July 13, 2009 TIME: 2:00 p.m. CTRM: 15, 18th Floor

JUDGE: The Hon. Marilyn H. Patel

Case No. 3:08-CV-05126-MHP

SUPPL. DECL. OF B. HALL ISO PLAINTIFFS' OPP TO POLGAR'S MSJ

I, Bill Hall, declare as follows:

- 1. I serve as the Executive Director of the United States of America Chess Federation, Inc. ("USCF"), a party to this action. Unless otherwise stated, I have personal knowledge of the facts stated herein.
- 2. At the time of the filing of the Doe lawsuit, the USCF did not know the extent of Polgar's involvement in the theft of confidential emails. The USCF has a history of allowing its Executive Director to authorize, initiate, and defend litigation on behalf of the USCF, and the USCF Executive Director has invoked this power—with no objections to my knowledge—over the USCF's history.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on June 22, 2009, in Tennessee.



ATTESTATION OF CONCURRENCE IN FILING

Pursuant to the General Order No. 45, section 45 X(B), for The United States District Court for the Northern District of California, I, Karl S. Kronenberger, hereby attest that the concurrence to the filing of this Supplemental Declaration of Bill Hall in Support of Plaintiffs' Opposition to Defendant Susan Polgar's Motion for Summary Judgment has been obtained from Bill Hall who has provided the conformed signature above.